

FILED  
 UNITED STATES DISTRICT COURT OFFICE  
 DISTRICT OF MASSACHUSETTS

2005 FEB -11 P 3: 08

BEGASHAW AYELE, PRO SE

Plaintiff

vs

COGNISA SECURITY COMPANY, INC

Defendant

U.S. DISTRICT COURT  
 DISTRICT OF MASS.

Civ. Action No. 04CV12217-PBS

**PLAINTIFF 'S RULE 26 INITIAL DISCLOSURES**

Plaintiff Begashaw Ayele "AYELE", hereby complies with Federal R. Civ. P. 26(a)(1) by providing all available information and reserve the rights to supplement any additional identification of individual witness, documentation through the process of this civil case as dictated per Fed. R. Civ. P. 26 (e).

**PART A**

**The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subject of the information.**

Response to Part A

- 1) Nichole Downes, Human Resource Manager, S. Cardinal lane, MA 01810, (978) 684-5098. As a Human Resource Manager, Ms. Downs has knowledge about plaintiff's "incomplete" employment application that was submitted at The Workplace office of the

Department of Labor, 99 Chauncey street 2<sup>nd</sup> Floor, in Boston, Massachusetts.

2) Aweke Alemayehu, Ph.D., (moved to Canada) Mailing, residential and phone number to be discover, was present at the time and place of the interview and was present when I was taking the Drug Test at Cognsia's client, Compliance Network, 15 Court square, Lower Level #1, Boston MA 02210.

3. Jennifer Rego, Human Resource Administrator, has all information as to plaintiff's employment application, Drug Test result and background check as well as other forms completed at Cognisa's office at 5 Middlesex Ave., in Somerville, Massachusetts,

4. Witnesses who are and will be identified by Defendant or Plaintiff in the deposition/discovery phase. Plaintiff's initial disclosures will be amended as further information is available in the future.

#### **PART B**

**A copy of or description by category and location of all documents, data compilation, and tangible things that are in the possession of custody, or control of the party and that the disclosing party may use to support its claims or defense unless solely for impeachment.**

#### **Response to Part B**

Plaintiff will re-produce any documents identified and produced by defendant since as a candidate of employment I do not have any organized file or documentation similar to the employer. However, plaintiff's EEOC/MCAD file will be requested from the commission and will be produced to the Defendant.

**PART C**

**A Computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based including materials bearing on the nature and extent of injuries suffered.**

**Response to Part C:**

Plaintiff has no documentation that can be used as a proof of damage recovery except some *cost* including photocopying, writing the claimant's response to the defendants correspondence and, any damage that should be calculated as a *lost wage* (or back pay and interest on back pay ) *and benefit* (insurance) resulting from employer's denial of employment.

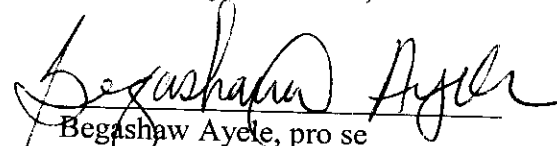
**PART D**

**For Inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgement.**

**Response to Part D**

Plaintiff has several bill concerning health in which payment was not effected as a result of defendant's failure to hire plaintiff thus denied insurance coverage.

Respectfully Submitted,

  
Begashaw Ayale, pro se  
261 O'Callaghan Way #816  
South Boston, MA 02127  
(617) 474 -9774

**CERTIFICATE OF SERVICES**

I, Begashaw Ayele, plaintiff in the above-referenced civil action certify that I have delivered the foregoing document entitled "PLAINTIFF'S RULE 26 INITIAL DISCLOSURE" by dropping at the front desk to be given to Attorney Bronwyn L. Roberts, at Duane Morris LLP, 470 Atlantic Avenue, Suite 500, Boston, MA 02210

Sincerely,

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Begashaw Ayele